

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Romar Cabinet and Top Company, Inc.
Attn: Anthony De Angelis
23949 South Northern Illinois Drive
Channahon, Illinois 60410

<u>Application No.:</u> 97080098	<u>I.D. No.:</u> 197420AAC
<u>Applicant's Designation:</u> CABINET 1	<u>Date Received:</u> July 24, 2003
<u>Subject:</u> Cabinet and Top Making Equipment	
<u>Date Issued:</u>	<u>Expiration Date:</u> April 15, 2003
<u>Location:</u> 23949 South Northern Illinois Drive, Channahon	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of three spray booths with filters, and one natural gas-fired air makeup unit pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons per year, individual hazardous air pollutants (HAPs) to less than 10 tons per year, and a combination of HAPs to less than 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 3a. Total emissions of volatile organic material from the above-referenced plant, including both coating lines and all other emission units, shall not exceed 25 tons per year. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.208(b).

- b. Emissions and operation of the 3 spray booths shall not exceed the following limits:

VOM Usage		VOM Emissions	
(Lb/Mo)	(T/Yr)	(Lb/Mo)	(T/Yr)
5,000	24.7	5,000	24.7

These limits are based on the maximum coating usage, the maximum VOM of the coating, and the minimum amount of VOM shipped off-site for disposal. VOM and HAPs usage and emissions shall be defined as the amount of VOM and HAPs purchased minus the amount of VOM and HAPs reclaimed and shipped offsite.

- c. Usage and emissions of volatile organic material from each spray booth shall not exceed 8 lbs/hr, pursuant to 35 Ill. Adm. Code 218.301.
- d. This permit is issued based on no VOM being used to clean the paint spray guns.
- e. Compliance with the annual limits shall be determined from a running total of the previous 12 months of data.
4. Emissions and operation of the one natural gas-fired air makeup unit and all other natural gas-fired equipment shall not exceed the following limits:

Fuel Usage		Pollutant	Emission Factor	Emissions	
(mmscf/Mo)	(mmscf/Yr)		(Lb/mmscf)	(Ton/Mo)	(Ton/Yr)
2.2	25.5	NO _x	100	0.2	1.3
		CO	84	0.1	1.1
		VOM	5.5	0.007	0.07

These limits are based on maximum fuel usage and standard AP-42 emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- 5a. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
- i. Usage of each type of coating, thinner, and any other VOM containing material (tons/month and tons/year);
 - ii. VOM and HAP content of each type of coating, thinner, and any other VOM containing material (wt. %);
 - iii. Amount of VOM and HAP shipped off-site for disposal (tons/month and tons/year);
 - iv. Amount of natural gas used (mmscf/mo and mmscf/yr);

- v. Operating hours for each of the 3 paint booths (hr/mo and hr/yr); and
 - vi. Detailed calculations of VOM and HAP emissions (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
6. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
7. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
8. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Usage of each type of coating, thinner, and any other VOM containing material (tons/month and tons/year);
 - b. VOM and HAP content of each type of coating, thinner, and any other VOM containing material (wt. %); and
 - c. Amount of VOM and HAP shipped off-site for disposal (tons/month and tons/year).

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It should be noted that this permit has been revised to change the usage and emissions limits for the spray booths as requested by the company.

It should be noted that the cleanup operations, parts cleaner, and glue station are not currently included in this permit. The Permittee will need to request revision of the permit to include these operations.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material (VOM), 10 tons per year of individual hazardous air pollutants (HAPs), and 25 tons per year of a combination of HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less coating is applied and a lower VOM content coating is used and control measures are more effective than required in this permit.

- 1a. Total emissions of volatile organic material from the above-referenced plant, including both coating lines and all other emission units, shall not exceed 25 tons per year. This condition is required to meet the exemption limit specified in 35 Ill. Adm. Code 218.208(b).
- b. Emissions and operation of the 3 spray booths shall not exceed the following limits:

VOM Usage		VOM Emissions	
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- c. Usage and emissions of volatile organic material from each spray booth shall not exceed 8 lbs/hr, pursuant to 35 Ill. Adm. Code 218.301.
- d. Compliance with the annual limits shall be determined from a running total of the previous 12 months of data.
2. Emissions and operation of the one natural gas-fired air makeup unit and all other natural gas-fired equipment shall not exceed the following limits:

Fuel Usage		Pollutant	Emission Factor (Lb/mmscf)	Emissions	
(mmscf/Mo)	(mmscf/Yr)			(Ton/Mo)	(Ton/Yr)
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		CO	84	0.1	1.1
		VOM	5.5	0.007	0.07

These limits are based on maximum fuel usage and standard AP-42 emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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